

UST news

SC DHEC

June 2004

TANK DOCTOR

Leslie Yasinsac, Compliance Inspector

Q. I'm tired of selling gas. Do I have to dig up my Underground Storage Tanks?

A. Not necessarily. If certain conditions are met, tanks can be temporarily closed for a long time. We call tanks in this condition Extended Out of Use (EOU). To put tanks in EOU, you must empty the tank so that less than 1 inch of liquid remains in the bottom of the tank. Simply selling fuel until no more will come from the hose will not get tanks emptied to this level. Most often, when the dispenser stops working, there is still 3 to 4 inches of liquid remaining in the tank. Your supplier may have a pump truck that can empty the tank; if not, the supplier will know someone who can do this.

If the tanks and/or lines are cathodically protected, that protection must be maintained, monitored, and tested just as though the tanks were in use. For example, galvanic protection or impressed current protection systems must be tested every three years. If you have an impressed current system, electrical power to the rectifier must remain ON, and you need to check the

output of that rectifier at least once every 60 days.

Other parts of the UST system, like the fill and the dispensers, need to be secured (with a lock or plastic strap). The electrical power to the pumps and dispensers should be OFF. Even though the tanks are not in use, the law requires tank registration fees to be paid every year. Also, financial responsibility must be maintained on the tanks and updated as necessary. Our tank inspectors will still conduct a compliance inspection about once a year to verify status at the facility. When you put tanks into EOU, please call us at (803) 896-6240 or (800) 826-5435 (in state only) so we can update our records. Please call us again at the same numbers when you want to put the tanks back into service, so we can help you start back up "in compliance."

Q. I think my neighbor just put a gas tank in his backyard. Is that regulated?

A. There is not enough information in your question for me to simply say "Yes" or "No." The first question I have is: "Is

the tank for petroleum?" A large tank that is white or light green plastic is probably for some kind of water-based solution like fertilizer. Our program does not address this type of tank. A fiberglass or epoxy-coated steel tank is a tank that can contain petroleum products. Even then, the rules do not cover some underground storage tanks that contain petroleum products. Our regulations do not cover tanks that contain gases (methane) or liquids under pressure (liquid propane). Heating oil tanks that store product that is consumed on the premises (for heat or steam or electricity) are not regulated; however, a tank for an emergency generator is regulated. A tank smaller than 110 gallons is not regulated. A tank smaller than 1,100 gallons at a residence or on a farm is not regulated if it is not for commercial (resale) use. Please call the staff in the Regulatory Compliance Division at (803) 896-6240 or (800) 826-5435 (in state only) to get help on whether or not a tank should be regulated. A permit is required before a regulated tank system can be installed.

"BUT MY TANK IS EMPTY"

Beverly McLeod, Regulatory Assistance Section

It is time again for annual tank registration fees. Invoices for Fiscal Year 2005 are being mailed June 1, 2004. This gives UST owners and operators enough time to pay the fee and receive their new registration certificate before the old ones expire on July 31, 2004.

If you receive a bill for tanks that you sold or permanently closed (removed from the ground or filled in

place with an inert material) before July 1, 2004, please write to us so we can correct your bill. We need to know the date the tanks were closed or transferred. Send the information to the Bureau of Land and Waste Management, UST Program, 2600 Bull Street, Columbia, SC 29201.

All regulated tanks that are in the ground, either in use or usable, are billable tanks. This means that if you

have regulated tanks in the ground that are empty but not properly closed (removed or filled in place), you will receive a bill. The law requires payment of the annual registration fee. When the new certificate comes, please remember to display it in the office or kiosk of the facility. Also, it is a good idea to send your supplier a copy of the certificate.



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Newsletter printed on recycled paper.

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MORE ON FLEX PIPING

Condensed from The Maine Installer - By Permission

Thanks to the Maine Board of Underground Storage Tank Installers for the following advice on using flexible piping:

We urge installers to closely assess piping systems and to be aware of issues in the piping system. Please ensure that automatic line leak detectors are functioning properly and interstitial space monitors for your piping are operating properly. It is very important that no fuel be allowed to remain in the secondary containment sumps of these systems. We encourage you to visibly inspect the piping by opening your dispenser cabinets and submersible pump manways. Evidence

that the integrity of the piping is compromised includes:

- The ells, tees, risers and flex connectors are misaligned, twisted or stressed;
 - The pipe may be overbent;
 - The outer jacket may extend over the fitting;
 - The pipe may be swelling;
 - The rubber "test boots" may be compressed or swollen;
 - The grommets in the sump walls may be pushed out or compressed or distorted;
 - The piping may be wrinkled, spongy, sticky, or softer than usual;
- Piping manufactured prior to 1994 that

is yellow in color may be delaminated and fungus growth may be attacking the outer walls of the pipe.

Pictures that demonstrate these points are available at the Mississippi Department of Environmental Quality internet site ([HYPERLINK "http://www.deq.state.ms.us"](http://www.deq.state.ms.us) www.deq.state.ms.us). From the home page, click on "Topics", "Underground Storage Tanks" and "Thermoplastic Piping Concerns."

To report a flexible piping concern or problem, please call the UST Compliance Section at (803) 896-6240. For more information, contact Dale Stoudemire at (803) 896-6844.

CALL US

Tanitra Marshall, UST Inspector

The UST Program handles lots of phone calls. We pass some of the calls to other agencies (a cat in a tree, outdoor burning, or above-ground storage tanks). Some calls we expect because the rules require them. For example, owners/operators should call before they install underground storage tanks, when there is a suspected release, and when they plan to permanently close an underground storage tank system.

Anyone who plans to install an underground storage tank needs a permit from our office. When called, the Program will send an application for a permit to install. The application includes tank system information, as well as questions pertaining to the layout of the facility and release detection equipment. When the Program has received a complete application, the permit to install is issued. The owner then will call to set the date and time for the installation so that an inspector can be present.

The second kind of call the program expects is about suspected releases. The rules require these reports to be made within 72 hours

after a release is first suspected. A release is suspected whenever the tank system is not operating normally or when the release detection results or testing shows that a release may have occurred. An example of an unusual operating condition may be surging or erratic flow from the dispensers. Another indicator could be complaints about water in the fuel. How is the water getting in and, if water can get in, can fuel get out? Consider having to order more fuel than normal without any unusual traffic (holidays or ball game weekends)—is this normal? Where is the gas going? If these conditions are reported (as they should be), the UST staff can help the owner investigate the condition and rule out a release. Or, if a release is underway, the owner can respond before the problem is catastrophic.

An example of a release detection result that should spur a call might be if it takes longer than normal to fill the car. The normal flow of fuel out of the nozzle is about 10 gallons per minute. Automatic line leak detectors restrict flow if the piping is leaking. When the flow gets down to a gallon or two a minute, customers will

complain. It is important that owners and operators report and investigate the problem. Another release detection result worthy of a call is an automatic tank gauge (ATG) report of a failed monthly test. In most instances there is nothing wrong, but the report has to be made.

Another call the Program expects is from owners/operators who plan to permanently close a UST system. This call should come at least 30 days before the closure to allow time to coordinate what will be done with the contents of the system (sludges and residues) and with the old tank. The owner or their representative must sign the disposal plan and send it to our offices. Then, owners/operators need to call to schedule the closure date so an inspector can be present.

These three required calls come frequently, and there are several other times the Program expects to hear from owners. To answer questions and provide quick responses, we have someone available at the UST Help Desk at (803) 896-6240 every business day. If you are not sure about when to call, call anyway. We will be glad to help.

PREVENTING COMMUNICATION FAILURES

Thomas Mimms, UST Inspector

Sometimes, out of compliance conditions are the result of a failure to communicate. For example, most tank owners/operators will hire a third party tester at some point. The testers will perform tank or line tightness tests, leak detector function checks,

cathodic protection system testing, and possibly environmental studies. When the testing is being done to satisfy compliance requirements, the owner/operator is responsible for getting the test results turned in to the UST Program on time, no matter who does the

testing. So, owners and operators need to clearly explain to the tester when the test results are due to the UST Program and whether or not the tester is expected to send them.

Clear communication is just as important between an owner and

tell their operators exactly what they expect. Sometimes, the owners need to train the operators in daily, weekly, and monthly duties to make sure the UST system is operated and maintained correctly. The operator needs to know how the system is supposed to work and how to respond to unusual signs or alarms. This is especially true for fire, life, and environmental dangers.

Operators who know what is normal and what is not can take the right actions to limit damage and to alert the owner when things go wrong.

Open communication between owners and testers and between owners and operators can increase the number of UST systems that are being operated correctly. The UST Program offers training on

operating and maintaining UST systems. The training is free and can help owners and operators get on the same page. The result will be better protection for human health and the environment—and that is a good thing. If you are interested in owner/operator training, call the Compliance Section at (803) 896-6240 or ask your local inspector.

“Repeat Violations By The Owner or Operator...”

Rebecca Lindler, Compliance Section and Will Green, Enforcement Project Manager

...may result in referral to the Enforcement Section, which could result in the collection of civil penalties and a court hearing.” When inspectors spot a violation during an inspection, the Compliance Section staff looks to see if the same violation was cited during previous inspections. The Enforcement Section follows up on these cases by issuing orders that include civil penalties. This practice follows guidelines established by DHEC’s Office of Environmental Quality Control. -

UST inspectors will still contact owners/operators by phone 7 to 10 days before the day of the inspection. The inspector will tell the owner/operator what records should be

available at the inspection and set up a specific time to review the records at the facility.

The most common repeat violation has been failure to have pressurized piping and line leak detectors tested every 12 months. Most often, this is caused by owners/operators not calling the testing company early enough to meet the annual requirement. In many cases, it is apparent that the owner/operator was waiting until the violation was issued to have the system tested. We are optimistic that the increased emphasis on being “In Compliance” at the inspection and avoiding repeat violations will help owners and

operators actively manage their UST systems with compliance in mind.

The goal of the UST Program is to have every facility “in compliance” at the time of the inspection. This goal becomes possible only if each and every owner and operator makes an effort to understand the rules and comply year after year. The Compliance Section can provide you with a compliance plan for your facility. Our inspectors can help you put together an operations and maintenance plan. If you need this kind of help, please contact the Compliance Section at 1-800-826-5435 (in SC only) or (803) 896-6240.

Something New

Kent Coleman, Director, Assessment and Corrective Action Division

As the Director of the Assessment and Corrective Action Division since early December 2003, I wanted to take the opportunity to introduce myself and talk about some of the changes that have recently been implemented. I have been with SCDHEC since 1992 and have worked in the assessment and cleanup of almost everything other than UST releases prior to joining the UST program. Although the technical issues presented by UST releases are often similar to what I have dealt with in the past, the differences in the program aspects are providing me with many new and welcome challenges.

Since my arrival, I have been impressed with the overall quality of

work by our project managers and the number of issues that get individual attention. As many of you know, our project managers carry a heavy project load. Not only is the number of projects large, but in the past, we have asked project managers to handle the assessment and corrective action aspects of each release. The large variety of issues made it difficult to provide timely attention to each and every concern. In order to help reduce the variety of issues faced by project managers and to address other program goals, we have recently reorganized the division.

We now have two sections dedicated exclusively to corrective actions and one section working

exclusively on assessment. Also, project managers are now distributed on a county basis. These changes will help project managers focus more closely on a smaller variety of issues. Another benefit will be that projects next door to one another will be managed by the same person. We hope the result will be better coordination of assessment and corrective action activity. Included as an insert in this newsletter is a table that shows the county assignments for assessment and corrective action project managers. I look forward to this opportunity to work with each of you and successfully meet the many challenges that face us when assessing and cleaning up UST releases.

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Excellence Award: Duke Energy



York's Duke Power Catawba Nuclear, owned by Duke Energy, garnered the Environmental Excellence Award this quarter. Local inspector Sherell Stevens noted, "For all the years that I have inspected this facility, it has always been above the standard." In fact, this site has been inspected annually since 1997 and has not received a single notice of violation. Hats off to Margott Rott and her Duke Power team for all of their compliance efforts.

An honorable mention should also be given to BOBOPS #3 in Walterboro and J.W. Fooshe, Inc. Outlet in McCormick. These two facilities also stood out among the eight nominees as being top-notch operations.

Late Breaking News ...

There have been updates to the Transfer of Ownership Form and the Assessment Guidelines for Permanent Closure and Change in Service. Call us at (803) 896-6240 to get a copy mailed to you or visit the Applications and Forms section on our Web site at [HYPERLINK "http://www.scdhec.gov/ust"](http://www.scdhec.gov/ust).

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